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*Pending pro hac vice appearance
for Objector Xanadu Corp*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: TRANSPACIFIC PASSENGER AIR)	Case No. 07-cv-05634-CRB
TRANSPORTATION ANTITRUST LITIGATION)	
)	MDL No. 1913
This document relates to: All Actions.)	
)	ADMINISTRATIVE MOTION TO
)	EXTEND TIME TO OBJECT TO
)	MOTION FOR SECONDARY
)	DISTRIBUTION, ETC. (ENTRY 1347)

Xanadu Corp (“Objector”), by and through its undersigned counsel, *pending appearance pro hac vice*, moves this Court to extend the time to lodge objections to the Motion for Secondary Distribution, etc.:¹

Class counsel filed a motion on August 8, 2022, outlining its plan to redistribute funds from 16,216 uncashed checks to other claimants and to receive an award of over half of that amount as attorney fees. See Entry 1347. The Prospective Objector, other potential affected persons, and the class, received unreasonable notice of the motion. Specifically, the only notice to the class of the motion was a message dated August 9, 2022, posted on the second page of the English version of the website www.airlinesettlement.com. Persons choosing Chinese or Japanese as their language choice received no notification.

¹ Class Counsel did speak with a paralegal at the undersigned’s firm about timing matters, but did not commit to consenting to extending the response time. Because the deadline has passed for objections, and the class members are now into the reply period for the motion, it is urgent that the motion be filed without additional delay.

Regardless, the class did not have any reason to know that they needed to look to the website daily to know that Class Counsel sought additional fees or planned to redistribute the money from claimants who did not receive their checks. Specifically, the claims administrator has the email addresses of all the claimants who did not receive delivery of their checks but it, at the behest of class counsel, never bothered to contact them.

The Objector learned of the website addition and the motion on August 25, 2022—after the response deadline. This is admittedly because its agents, and most probably the other 60,000 class member claimants, do not check the website on a daily basis.

Objector, affected by the redistribution process, requests that this Court grant until September 7, 2022, for it and its counsel to consider the merits of, and potentially weigh, objections with respect to important matters such the form of notice provided, the terms of the redistribution, the handling of the payments to the class, and other matters that need to be researched and weighed before an objection can be intelligently filed with all issues.

WHEREFORE, it is respectfully requested that the time be enlarged until September 7, 2022, for the Objector to file objections to the redistribution process and the request for attorney fees.

Respectfully submitted,

/s/ J. Allen Roth, Esq.

J. Allen Roth, Esq.

COUNSEL FOR OBJECTOR
(PENDING ADMISSION *PRO HAC VICE*)